

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
ELKINS**

UNITED STATES OF AMERICA,

v.

Criminal No. 2:20-MJ-18

THOMAS COOPER,

Defendant.

UNITED STATES' NOTICE OF INITIAL DISCOVERY
DISCLOSURE AND REQUEST FOR DISCOVERY

The United States of America and William J. Powell, United States Attorney for the Northern District of West Virginia, by Stephen D. Warner, Assistant United States Attorney for said District, and pursuant to Rule 16 of the Federal Rules of Criminal Procedure and the local rules of this Court, submitted its initial discovery disclosure via USA File Exchange, containing documents Bates numbered US000001 through US000099 and placeholdered exhibits (audio recordings of the 04/21/20 interview of Pendleton County Clerk Elise White and the 04/27/20 statement of Mr. Cooper), to counsel for Defendant.

UNITED STATES' REQUEST FOR DISCOVERY

The United States of America by William J. Powell, United States Attorney for the Northern District of West Virginia and Stephen D. Warner, Assistant United States Attorney, and pursuant to:

**Rule 16(b)(1)(A)
Documents and Tangible Objects**

Moves the Court to order the defendant to permit the United States to inspect and copy or photograph, books, papers, documents, photographs, tangible objects or copies or portions thereof which are in the possession, custody or control of the defendant and which the defendant intends to introduce as evidence in chief at the trial.

**Rule 16(b)(1)(B)
Results or Reports of Physical or Mental Examinations**

To order the defendant to permit the United States to inspect or photograph any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the particular case or copies thereof within the possession or control of the defendant which the defendant intends to introduce as evidence in chief for the trial or which were prepared by a witness whom the defendant intends to call at the trial when the results of the reports relate to that witness's testimony.

Rule 16(b)(1)(C)
Expert Witnesses

To order the defendant to provide to the United States a written summary of any testimony that the defendant intends to use under Rules 702, 703 or 705 of the Federal Rules of Evidence.

Respectfully submitted,

WILLIAM J. POWELL
UNITED STATES ATTORNEY

By: /s/ Stephen D. Warner
Stephen D. Warner
Assistant United States Attorney

CERTIFICATE OF SERVICE

I, Stephen D. Warner, Assistant United States Attorney for the Northern District of West Virginia, hereby certify that on June 1, 2020, the foregoing *United States' Notice of Initial Discovery Disclosure and Request for Discovery* was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to defense counsel.

WILLIAM J. POWELL
UNITED STATES ATTORNEY

By: /s/ Stephen D. Warner
Stephen D. Warner
Assistant United States Attorney